

# CATEGORY 1

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SUBJECT: Responds to NRC 971030 ltr re violations noted in insp repts  
50-387/97-07 & 50-388/97-07. Corrective actions: restored Unit  
1 "A" SBLC pump to operable status upon completion of  
preventive main on accumulator & revised maint procedures.

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U. S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
REPLY TO A NOTICE OF VIOLATION**

**(50-387/97-07-06 AND 50-387/97-07-10, 50-388/97-07-10)  
PLA-4807**

**Docket Nos. 50-387  
and 50-388**

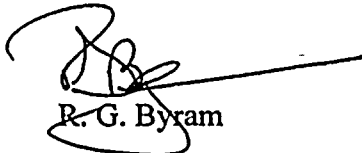
**FILE R41-2**

This letter provides PP&L, Inc.'s response to the Notice of Violation (50-387/97-07-06 and 50-387/97-07-10, 50-388/97-07-10) contained in NRC Integrated Inspection Report 50-387/97-07 and 50-388/97-07 dated October 30, 1997.

The NRC letter which transmitted the Notice of Violation also requested that PP&L include additional actions that we deem appropriate to assure that our 50.54(f) design basis review process will, at its completion, identify design issues similar to those that have been identified by the NRC. This concern was previously identified in the NRC letter transmitting NRC Inspection Report 50-387/97-06, 50-388/97-06 and Notice of Violation, dated October 27, 1997, and is addressed in that response.

We trust that the Commission will find the attached response acceptable. If you have additional questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,

  
R. G. Byram

Attachment 332

I EOI/

copy: NRC Region I  
Mr. K. Jenison, NRC Sr. Resident Inspector  
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

9712050133 971203  
PDR ADOCK 05000387  
Q PDR



**Violation 1 (387/97-07-06)**

Unit 1 Technical Specification (TS) 6.8.1 requires written procedures be established, implemented, and maintained covering the procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Revision 2, February 1978. Item 9.a. of Appendix A to RG 1.33, requires procedures for maintenance that can affect the performance of safety related equipment. On September 10, 1997, SSES procedures to control maintenance on the "A" Standby Liquid Control (SBLC) nitrogen accumulator included work authorization H70595, maintenance procedure MT-053-003, SBLC Accumulator Maintenance, and operations procedure SO-153-004, Quarterly SBLC Flow Verification.

Contrary to the above, on September 10, 1997, the SSES procedures for control of SBLC maintenance were inadequate in that the procedures did not control the activities such that the system remained in an analyzed configuration. The unanalyzed configuration had the potential to negatively affect the performance of this safety related system.

**Response****1. Reason for the Violation**

The primary purpose of the maintenance work activity performed on the Unit "1" "A" Standby Liquid Control system (SBLC) pump accumulator on September 9, 1997, was to check the air pressure in the accumulator. However, the work authorization document supporting the activity also contained an improper work step related to the repair and repressurizing of the accumulator. Procedurally these two work activities are required to be separated since the repair and repressurizing the accumulator may affect system operability. This can be performed by either creating a new work authorization document or revising the original work document to include the new work activity. The work authorization review process failed to identify the error. On September 9, 1997, the "A" SBLC pump accumulator was inadvertently depressurized while checking the accumulator's air pressure. The Control Room when contacted concerning the accumulator work on the "A" pump understood that the work activity being discussed was to repressurize the accumulator. However, repressurizing the accumulator had been performed in the past, and was considered to be acceptable and covered by past equipment release process documentation. Upon recognition that repressurizing the accumulator may affect system operability, an operability determination was written.



**2. Corrective Steps Which Have Been Taken and the Results Achieved**

- a) The Unit 1 "A" SBLC pump was restored to operable status upon completion of the preventative maintenance on the accumulator. This preventative maintenance evolution took approximately fifteen minutes which was within the eight hour Technical Specification LCO when both pumps are out of service.
- b) The preventative maintenance work plan and procedure used for pump accumulator activities (MT-053-003) has been revised to document that the pump accumulator is required to maintain pump operability, and to require documentation of a deficient condition, if identified, during performance of the maintenance activity. This assures that the operability of the SBLC system is maintained.

**3. Corrective Steps Which Will Be Taken to Avoid Further Violations**

- a) An evaluation is being performed to determine the design basis for the SBLC pump accumulator. This evaluation will be utilized to determine the necessity of the accumulator for pump operability during the performance of various surveillance requirements. These activities are scheduled to be completed by February 27, 1998.
- b) The work planning process will be evaluated, and revised as appropriate, to ensure that operability is not challenged when work activities are planned and performed. This effort will be completed by February 27, 1998.
- c) PP&L will review this event with personnel involved with the work authorization implementation and review process. The review of this event with the aforementioned personnel will be completed by December 31, 1997.

**4. Date of Full Compliance**

Based on (2) above, PP&L is in full compliance

**Violation 2 (387-388/97-07-10)**

10 CFR 50.59 states, in part, that licensees may make changes in the facility as described in the safety analysis report without prior Commission approval unless the proposed change involves an unreviewed safety question (USQ). The licensee shall maintain records of changes in the facility made pursuant to this section. These records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, as of September 24, 1997, a change was made to the ultimate heat sink, the spray pond, which is described in the SSES safety evaluation report, by adding a floating maintenance platform without a safety evaluation to support a determination that the change did not involve a USQ. The platform had been manufactured by PP&L and placed on the ESW/RHRSW spray pond on several occasions without a supporting safety evaluation. The violation applies to both SSES Unit 1 and 2.

**Response****1. Reason for the Violation**

The use of the floating maintenance platform has been included in previous work authorization packages, as a normal work practice to access the spray pond for various work activities. Although specific work activities are evaluated for their effects on associated system operability, the work planning and subsequent reviews had not identified the use of the platform in the spray pond as an activity requiring a 50.59 review. The lack of procedural guidance to support the use of the platform in the spray pond resulted in the violation. The use of the platform was, therefore, based on an undocumented position that the spray pond remained operable with the platform in the pond.

**2. Corrective Steps Which Have Been Taken and the Results Achieved**

The floating maintenance platform was removed from the spray pond; therefore, the unanalyzed condition which created the potential for an unreviewed safety question was eliminated.

**3. Corrective Steps Which Will Be Taken to Avoid Further Violations**

- a) The floating maintenance platform will not be used in the spray pond until a procedure necessary to support the acceptability of the platform in the spray pond for maintenance activities has been completed.

- b) NDAP-QA-0506 "Foreign Material Program" will be revised to include guidance for the control of tools used for spray pond activities. This procedure revision is scheduled to be completed by 2/15/98.
- c) PP&L will review this event with personnel involved with the work authorization implementation and review process. The review of this event with the aforementioned personnel will be completed by December 31, 1997.
- d) Additional Nuclear Department actions associated with the Current Licensing Basis Program are identified in PP&L's response to the Notice of Violation transmitted in NRC's letter dated October 27, 1997, with NRC Inspection Report 50-387/97-06, 50-388/97-06.

**4. Date of Full Compliance**

Based on 2 above, PP&L is in full compliance.



